

From: [Paul Peronard](#)
To: [Gary Moore](#)
Subject: Re: Question
Date: 04/05/2012 10:23 AM

Hey Gary, I'm on the road, can I call you tomorrow? I think you are mostly on target but need to discuss a couple things to be sure.

paul

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▼ [Gary Moore](#)

----- Original Message -----

From: Gary Moore
Sent: 04/04/2012 04:10 PM CDT
To: Paul Peronard
Subject: Question

Paul:

I hate to bother you after taking your training at readiness but I wanted to make sure I was approaching this correctly.

I have a PRP site that has a number of crude oil storage tanks. Over the years these tanks have deteriorated causing roof structure problems (ie. leaky roofs). These tanks have accumulated rainwater with the oil and sludges.

1. The sludges will be K169 (assuming disposal unless they can introduce it into a refinery for recovery);
2. The oil will be recycled;
3. The rainwater/accumulated water will be treated and discharged via land irrigation;

On waste stream 3, the RP aggregated the rainwater from several tanks into a single tank of which one of the samples from one of the tanks shows the waste to be D018 (Benzene). Since they aggregated the waste, the entire volume of water now becomes D018 (Is this correct?). In addition, the treatment standards that have to be met before they are able to land apply/irrigate would be those at 268.48 or more stringent requirements as defined by the State (Is this correct?)

They have resampled the rainwater/accumulated water waste stream so I don't know at this point if it will also show it to be D018 (Benzene).

I think I am correct but wanted to make sure.

Thanks

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